

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C. 20554

In the Matter of

AMENDMENT OF SECTION 73.606(b)
TABLE OF ALLOTMENTS
TV BROADCAST STATIONS
(Memphis, Tennessee)

File No. RM-_____

To: The Commission

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PETITION FOR RULEMAKING

Cossitt Library d/b/a Memphis/Shelby County Public Library and Information Center ("Library"), licensee of Noncommercial Educational Station WYPL(FM), Memphis, Tennessee, hereby requests the Commission to institute a rulemaking proceeding to allot Channel 56 to Memphis and to reserve that channel for noncommercial educational use. Specifically, the Library requests that the Commission make the following changes in the Table of Allotments.

<u>City/State</u>	<u>Present</u>	<u>Proposed</u>
Memphis, TN	3-, 5+, *10+, 13+, *14+, 24, 30, 50+	3-, 5+, *10+, 13+, *14+ 24, 30, 50+, *56


The attached Engineering Statement, prepared by E. Harold Munn, Jr. & Associates, Inc., establishes the Channel *56 can be allotted to Memphis in compliance with the Commission's distant separation rules. Further, the reference point for the allotment is not within the minimum co-channel separation distance of any city within the scope of the

2.

Commission's Advance Television System freeze. See Advance Television Systems, Mimeo No. 4074 (Appendix) (released July 17, 1987).¹

The Library requests reservation of the proposed channel for use by a Noncommercial Educational Station. If Channel *56 is allotted to Memphis, the Library expeditiously will file a construction permit application for that channel and, if the application is granted, promptly will build the proposed station.²

COSSITT LIBRARY D/B/A MEMPHIS/SHELBY
COUNTY PUBLIC LIBRARY AND
INFORMATION CENTER

By 
Matthew H. McCormick

Its Counsel

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Prepared December 22, 1995

¹ The nearest city affected by the freeze is Nashville, Tennessee. The distance between the Nashville and Memphis reference points is 314.65 kilometers. The minimum co-channel separation in Zone II, in which both Nashville and Memphis are located, is 280.8 kilometers. See Engineering Statement.

² The Library is committed to instituting an over-the-air noncommercial educational television service. It recently filed an application for a construction permit for a new station to operate on Channel *14 at Memphis.

**ENGINEERING REPORT
In Support of a Petition
To Add UHF Channel 56
At Memphis, Tennessee
December, 1995**

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E. HAROLD MUNN, JR. & ASSOCIATES, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

TABLE OF CONTENTS

1. Table of Contents
2. Discussion of Special Study
3. Certification of Engineer
4. Exhibit E-1 - Tabulation of Spacings In Allocation on Channel 56

CERTIFICATION OF CONSULTANT

The firm of E. Harold Munn, Jr. & Associates, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data submitted in this report.

The data utilized in this report was taken from the FCC Secondary Database and other data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of those data errors or omissions.

The report has been prepared by or under the direction of the undersigned, whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

E. Harold Munn, Jr. & Associates, Inc.

December 20, 1995

by Virgil M. Royer
Virgil M. Royer, Staff Engineer

by Wayne S. Reese
Wayne S. Reese, President

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ENGINEERING STATEMENT

In Support of a Petition To Amend §73.606(b)

The firm of E. Harold Munn, Jr. & Associates, Inc., was retained to prepare this Engineering Statement in support of a petition to amend 47 C.F.R. Section 73.606(b), the TV Table of Allotments.

It is proposed to amend the Table to add Channel 56, 722-728 mHz at Memphis, Tennessee as the third reserved non-commercial TV channel in the community. A zero frequency offset must be specified. For the purposes of this study, the coordinates specified are those of reference point of the community. This site meets the spacings of §73.610(b), and §73.698 Table II.

Exhibit E-1 is a pertinent portion of the computer study which demonstrates that, at the reference point listed, and for the class of station proposed, all the required separations are fully met for the allotment of Channel 56Z.

The reference point considered for the study is NL 35° 06' 20"; WL 90° 00' 25". This is a point within the city from which the 80 dBu contour of the proposed facility would encompass the entire community.

The reference point for this allocation is located in Zone II. The closest market subject to the advanced television (ATV) freeze is Nashville, TN, with reference coordinates of NL 36°09'33"; WL 86°46'55". The proposed allocation reference point is 314.65 km from the Nashville reference point, which is more than the required co-channel spacing of 280.8 km for UHF channels. Therefore, the allotment is not subject to the ATV freeze order.

It is requested that 47 C.F.R. §73.600(b) be amended as follows.

<u>CITY, STATE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Memphis, Tennessee	3-, 5+, *10+, 13+, *14+ 24, 30, 50+	3-, 5+, *10+, 13+, *14+ 24, 30, 50+, *56

517 278-7339

INTERFERENCE CHECKS WITH NEW MEMPHIS AT N. LAT. 35 6 20 W. LNG. 90 0 25

ZONE = 2

PWR = 5000 K.W. H.A.A.T = 600 M

CH#	CALL	ZONE	Type	REQUIRED	CLEAR	BEARING	DISTANCE	LAT.	PWR(KW)	INT.	PRO.
CITY			STATE	LICENSEE		<---		LNG.	MAX HAAT	FILE #	
<hr/>											
41Z	AL945 UNION CITY	2	CAL TN	NA	119.9	50.4	30.6 210.6	170.30 km 105.82 Mi	36 25 36 89 2 54	5000.00 600.0M	--- 106.64
42Z	KVUT LITTLE ROCK	2	CCP AR	YV LEININGER-GEDDES PARTNERSH	95.7	88.9	262.0 82.0	184.65 km 114.74 Mi	34 52 28 92 0 35	5000.00 156.0M	--- 69.24 BPCT930927KG HAMSL = 235 M
42Z	KVUT LITTLE ROCK	2	CAP AR	DYV LEININGER-GEDDES PARTNERSH	95.7	134.2	261.5 81.5	229.85 km 142.82 Mi	34 47 56 92 29 44	3390.00 334.0M	--- 82.80 BMPCT950111KM HAMSL = 461 M
				DA>				ODD950111BOG @ 0			
48+	CP906 JONESBORO	2	CCP AR	YV ARKANSAS RURAL TELEVISION	31.4	87.7	317.0 137.0	119.08 km 73.99 Mi	35 53 27 90 54 6	2190.00 305.0M	--- 76.10 BPCT900821KF HAMSL = 383 M
48+	AP907 JONESBORO	2	CAP AR	DYV BANNER BROADCASTING CORPOR	31.4	89.6	315.8 135.8	121.00 km 75.19 Mi	35 53 17 90 56 9	2510.00 342.0M	--- 80.86 BPCT900703KI HAMSL = 414 M
				DA>				ODD900703DIE @ 0			
49Z	WDKA PADUCAH	2	CCPM KY	YV MACPHERSON B/CASTING OF KE	95.7	175.9	20.7 200.7	271.63 km 168.78 Mi	37 23 45 88 56 23	2630.00 327.0M	--- 79.79 BMPCT930326KG HAMSL = 453 M
52+	AL819 TUSCUMBIA	2	CAL AL	NA	31.4	183.6	101.1 281.1	215.00 km 133.59 Mi	34 43 54 87 41 54	5000.00 600.0M	--- 106.64
55+	AL010 POPLAR BLUFF	2	CAL MO	NA	87.7	99.1	349.1 169.1	186.75 km 116.04 Mi	36 45 30 90 23 54	5000.00 600.0M	--- 106.64
56-	AL660 ARAB TIVE 07-18-86	2	CAL AL	A	280.8	52.6	105.2 285.2	333.42 km 207.18 Mi	34 19 0 86 29 42	5000.00 600.0M	--- 106.64
58+	AL965 KENNETT RESTR. 15.1 KM SOUTH	2	CAL MO	NA	31.4	79.3	358.4 178.4	110.65 km 68.75 Mi	36 6 9 90 2 25	5000.00 600.0M	--- 106.64